

*KIRTON LAW FIRM*

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| USDC SDNY             |
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April 18, 2023

## VIA ELECTRONIC FILING

Hon. Victor Marrero  
 United States District Judge  
 Daniel Patrick Moynihan  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007

Re: *U.S. v. Isaiah Ward, 19 cr. 627 (VM)*

Dear Judge Marrero:

I represent Isaiah Ward in the above-referenced matter. I request a bail modification permitting Mr. Ward to relocate to the Eastern District of Texas with his family.

Mr. Ward was released on bond under the following conditions: 1. \$50,000 PRB co-signed by two financially responsible persons, 2. travel restricted to the SDNY and the EDNY, 3. surrender of passport and no new applications, 4. pretrial supervision, drug testing/treatment as directed by Pretrial Services, 5. curfew, 6. electronic monitoring, 7. defendant to continue/seek employment, 8. defendant not to possess a firearm/destructive device or other weapons, 9. no contact with co-defendants outside the presence of counsel, 10. defendant to reside at 1507 Metropolitan Avenue, Apt. 6A New York, NY 10462, and may not change residence unless approved by Pretrial Services, 11. defendant must stay away from being in the zone or vicinity of 155-159 Street and Amsterdam Avenue.

According to Pretrial services, Mr. Ward is in compliance with the conditions of his bond. Mr. Ward's mother secured a job and housing in Houston, Texas.<sup>1</sup> She intends to take Mr. Ward and the other members of her family to Texas this week. Mr. Ward will be in a quiet and safe neighborhood in Houston. He has plans to enroll in an online Academy later this week. I have consulted with Pretrial Services and AUSA Rothman concerning this move. Pretrial Services approves the move, and the Government has no objection. I request that his bail be

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<sup>1</sup> Pretrial Services is in receipt of her job and housing information.

modified to allow him to relocate to Houston, Texas, and be supervised by the Eastern District of Texas. Mr. Ward will appear in person at the sentencing before this Court.

Please contact me if you have any questions or concerns.

Sincerely,

*Marlon Kirton*  
Marlon G. Kirton, Esq.

cc: Alexandra Rothman, Assistant United States Attorney (via electronic mail)

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| <b>Request GRANTED.</b> | The Court hereby<br>approves bail modification requested<br>above.  |
| <b>SO ORDERED.</b>      | <br>VICTOR MARRERO, U.S.D.J. |
| 4/19/2023               |   |
| DATE                    |   |